

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)

v.)

JUANA EDITH VELA-SALINAS)

No. 3:11-00083-19

Chief Judge Haynes

DAUBERT
This motion
is DENIED without
prejudice to renew
at a later date
of 2/23/14
motion
and
review
of the
defense
experts
report.

**MOTION TO CONTINUE TRIAL TO HOLD A DAUBERT HEARING OR,
ALTERNATIVELY, TO PROHIBIT RON HICKMAN FROM TESTIFYING AT TRIAL**

The United States of America, by its attorneys David Rivera, United States Attorney for the Middle District of Tennessee, and Brent A. Hannafan, Assistant United States Attorney, respectfully requests that this Court continue the trial date of July 29, 2104, due to the July 7, 2014 disclosure of a forensic accountant as an expert witness on defendant's behalf.

The United States respectfully requests this Court continue the trial in order to hold a "Daubert hearing" pursuant to Rules 403, 702, 703, and 704 of the Federal Rules of Evidence to determine whether defendant's expert should be permitted to testify at trial. In the alternative, the United States requests this Court order that defendant's expert, Ron Hickman, be prohibited from testifying at trial.

Background

On July 7, 2014, defendant's counsel disclosed that defendant would call an expert witness at trial and provided a report prepared by a forensic accountant, Ron Hickman, CPA/CFF, CFE. The report is dated June 30, 2104. It describes a forensic accounting of defendant's bank accounts and records relating to the purchase and sale of vehicles allegedly involved in the money laundering conspiracy charged in Count Two of the pending indictment. The report and the ten exhibits attached thereto are approximately 50 pages long. A copy of the report and exhibits is attached hereto as Exhibit 1.